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October 14, 2020

VIA ECF

The Honorable Philip M. Halpern, U.S.D.J.
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 1007

Re: Stephenson v. Exclusive Motor-Sports LLC, et al.
Docket No. 20-cv-01332(PMH)
RR File No.: 000970-00067

Dear Judge Halpern:

I write on behalf of Bethpage Federal Credit Union ("BFCU"), a Defendant in the above-referenced case. Specifically, I write seeking clarification of Your Honor's Memo Endorsement (the "Memo") issued earlier today in response to the letter motion filed by counsel for the Exclusive Motor Defendants [D.E. 51] seeking, on behalf of all Defendants, an extension of the deadline to respond to Plaintiff's second amended complaint (the "Letter").

As set forth in the Letter, BFCU joined in the Exclusive Motor Defendants' request for an extension and authorized counsel for the Exclusive Motor Defendants to submit the Letter on BFCU's behalf. The So Ordered version of the Letter states that the "time for defendants to answer or otherwise move with respect to the second amended complaint is extended to 11/4/2020." (Emphasis added). While the Memo contains the same language, it also states the following: "Exclusive Motor Cars LLC answer due 11/4/2020; Exclusive Motor Sports & Collision Center LLC answer due 11/4/2020; Exclusive Motor-Sports LLC answer due 11/4/2020."

In an abundance of caution, given that the Memo does not expressly reference BFCU, I write to confirm that BFCU's deadline to answer or otherwise move with respect to Plaintiff's second amended complaint is likewise extended to November 4, 2020. As explained in the Letter, Plaintiff has advised the parties that she intends to seek leave to file a third amended complaint and, thus, the parties will not know if the second or third amended complaint is the operative complaint until the Court rules on Plaintiff's anticipated motion.

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The Court's attention to this matter is greatly appreciated.

Respectfully submitted,

RIVKIN RADLER LLP

Michelle A. Bholan

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cc: All counsel of record (via ECF)